







Additional Information Supplementing October 2009 Comments on Notice of Proposed Rulemaking 16 CFR Part 310 Telemarketing Sales Rule Debt Relief Amendments, R411001

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CEO - US Debt Resolve









US Debt Resolve Background

- First in industry
 - ISO 9001-2000 Certified
 - National Bank Certification
- Standards Commitment
 - Supporter of Original UDMSA
 - Suitability Check list for clients
- Value added Service
 - Education Programs
 - Career Training
 - Financial Management Tools



US Debt Resolve Company Stats



General Comparison, debt statistics 2007-2009



Average Consumer Debt Load	\$31,411
Average Credit Card Account Balance	\$5,646
Average Amount of Accounts	6.1
Average Length in Program	37



Statistics Provided:

•US Debt Resolve Average Data of All Clients Enrolled from 2007-2009





The Basics: Program Calculations



Basic Program Calculation:

Service Fee	=	Debt (X) Service Fee %
Savings	=	Debt (X) Est. Savings %
Total Cost of Program	=	Savings (+) Service Fee
Monthly Payment	=	Monthly Payment (/) Months in Program







2007 Fee model	Fee collected evenly over 18 months
2008 Fee Model	First 3 payments remainder paid over duration of program
2009 Fee model	First payment remainder paid over duration of program









2008 Model Specifications

Formula:

# of Accounts to Settle Per Month	# of Accounts aged > 210 Days / Average Length of Program
Total \$ of Accounts to Settle Per Month	\$ of Accounts aged >210 Days / Average Length of Program

Example:

	18,368 > 210 Days /
# of Accounts to Settle Per Month	40 Months =
	460 Accounts Per Month
	\$94,586,0373 > 210 Days /
Total \$ of Accounts to Settle Per Month	40 Months =
	2.36 Million

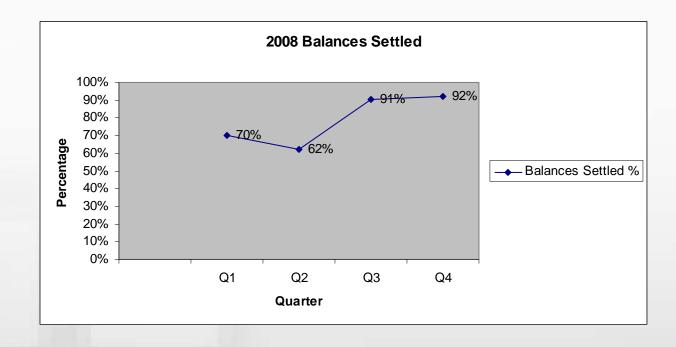














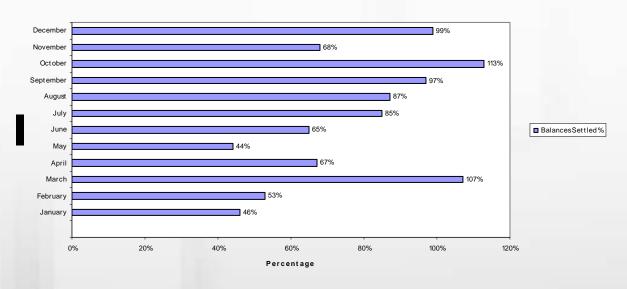




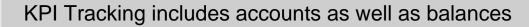




2008 Balances Settled



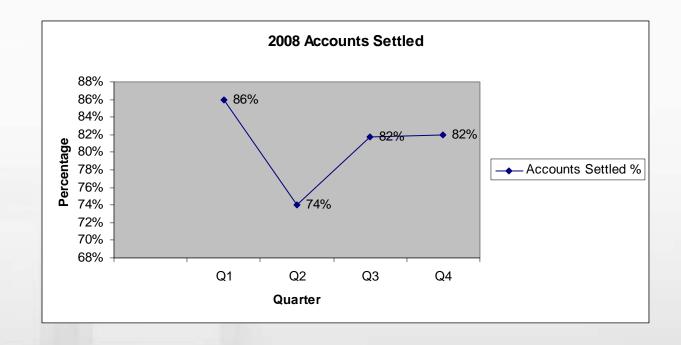














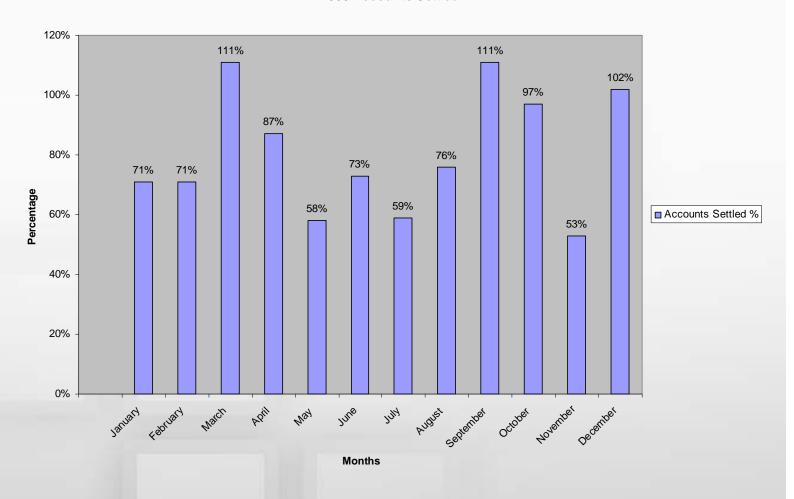




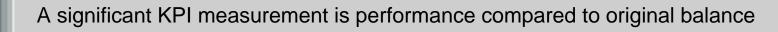


Comprehensive data indicates 81% performance for both accounts and balances

2008 Accounts Settled



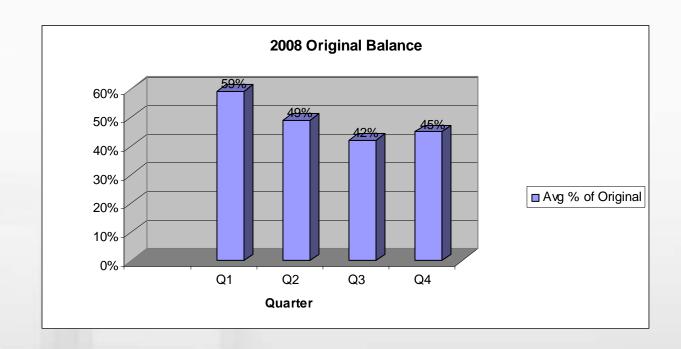




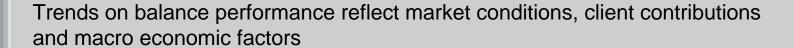










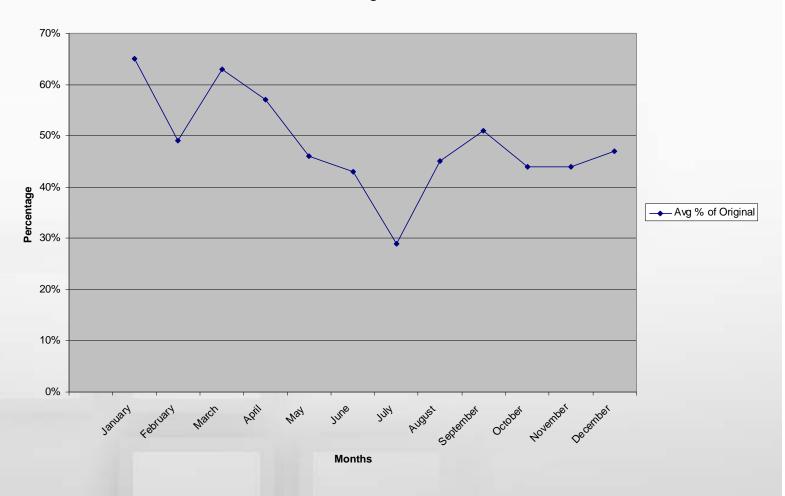








2008 Original Balance



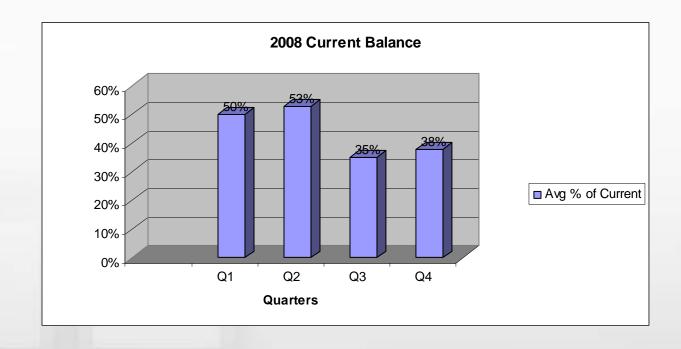


Comprehensive data indicates 49% performance for original balances and 44% for current balances settled











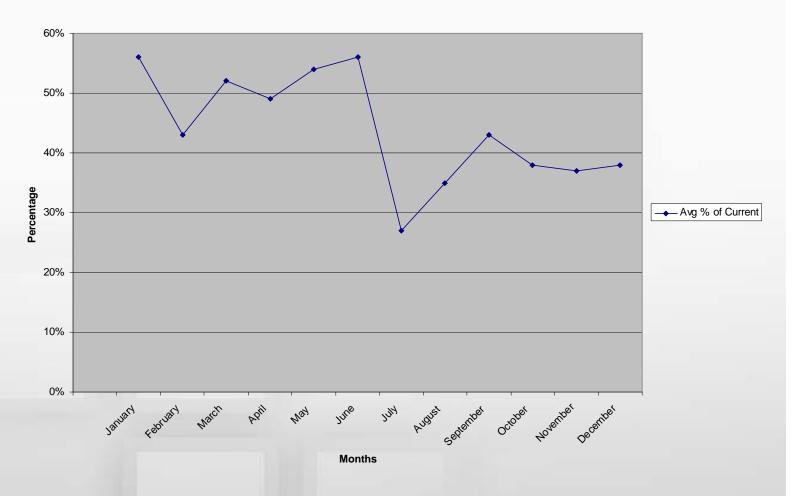






KPI monthly Current Balance breakout

2008 Current Balance











2009 Model Specifications

Formula:

# of Accounts to Settle Per Month	# of Accounts aged > 120 Days / Average Length of Program
Total \$ of Accounts to Settle Per Month	\$ of Accounts aged >120 Days / Average Length of Program

Example:

# of Accounts to Settle Per Month	20,572>120 Days / 36 Months =
# of Accounts to Settle 1 et Month	571 Accounts Per Month
	\$ 106,051,361 > 120 Days /
Total \$ of Accounts to Settle Per Month	36 Months =
	2.945 Million

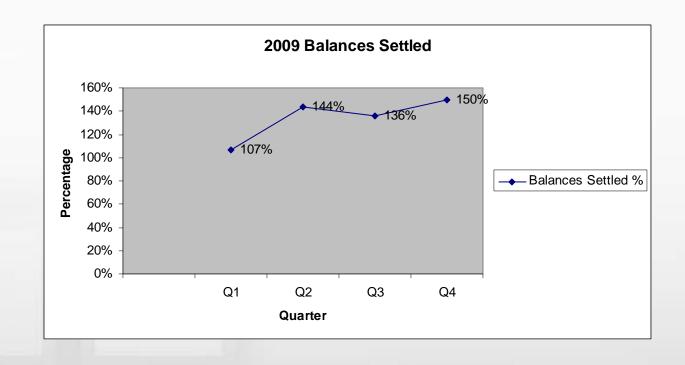


Improvement in performance is a direct result of implementation of a new service fee model, operational enhancement and reporting, and improved debt owner relationships











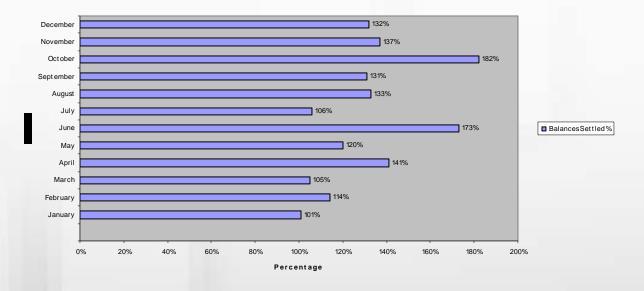




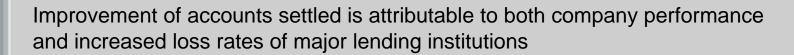


KPI – 2009 monthly breakout

2009 Balances Settled



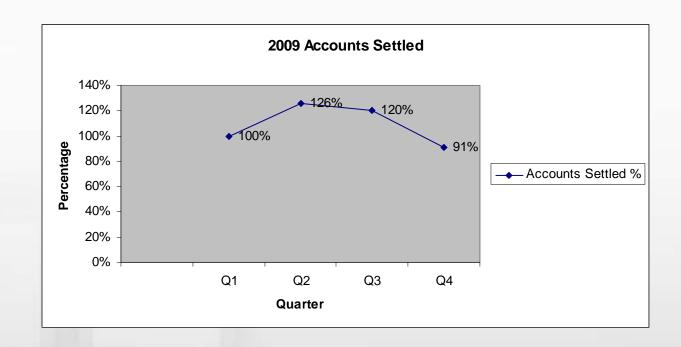














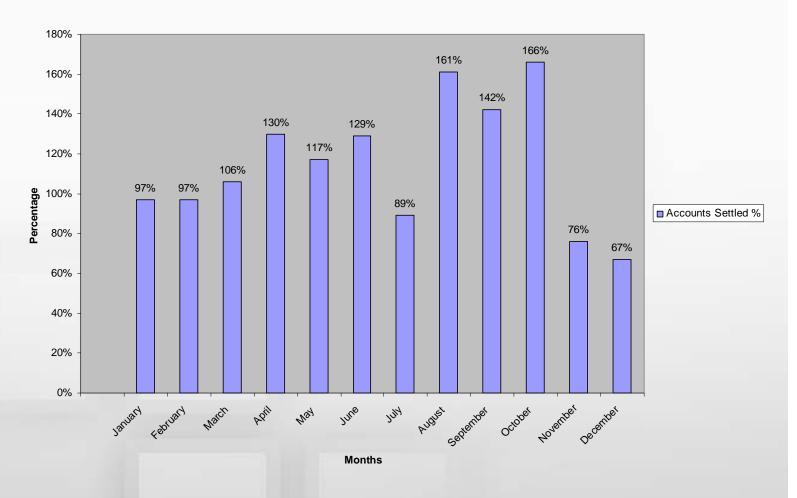






Comprehensive data indicates 107% performance for accounts and 135% for balances settled

2009 Accounts Settled



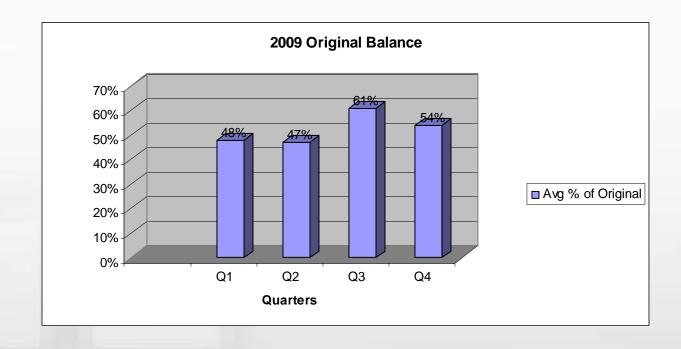














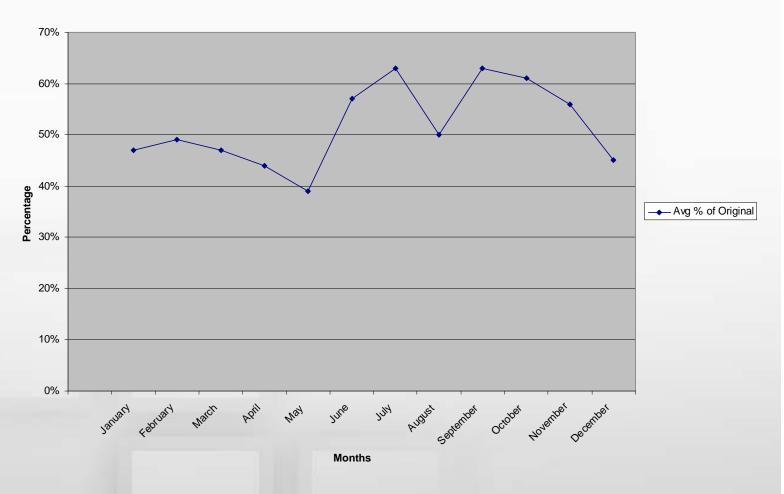




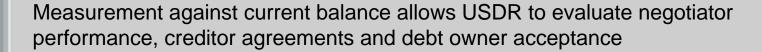


KPI - 2009 monthly breakout

2009 Original Balance



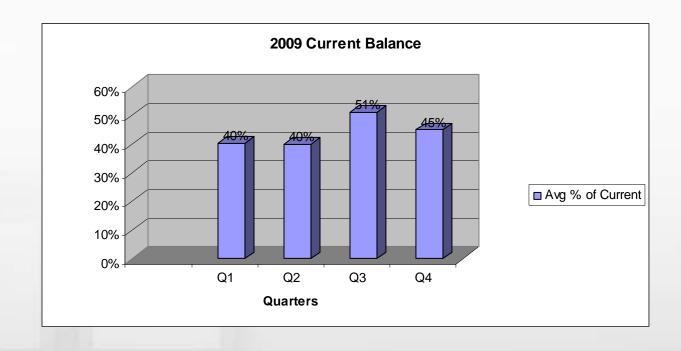




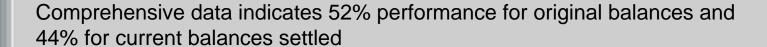










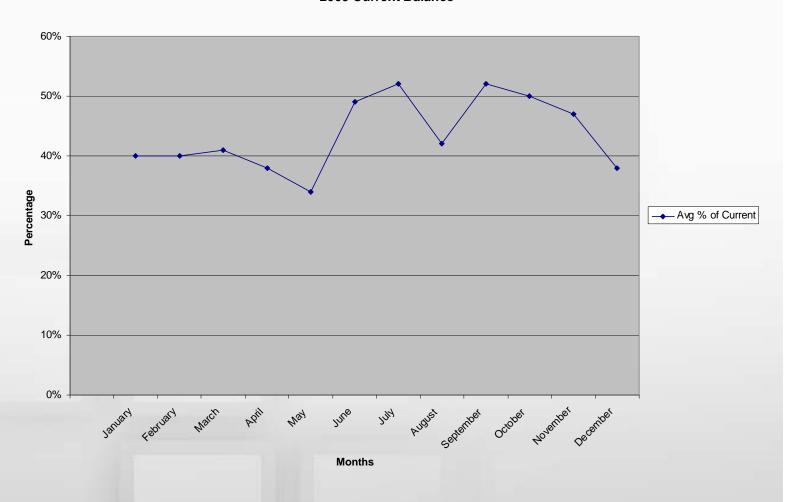






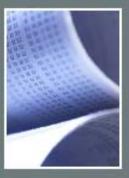


2009 Current Balance



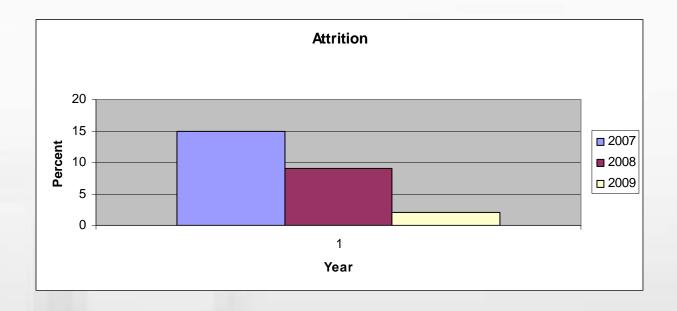














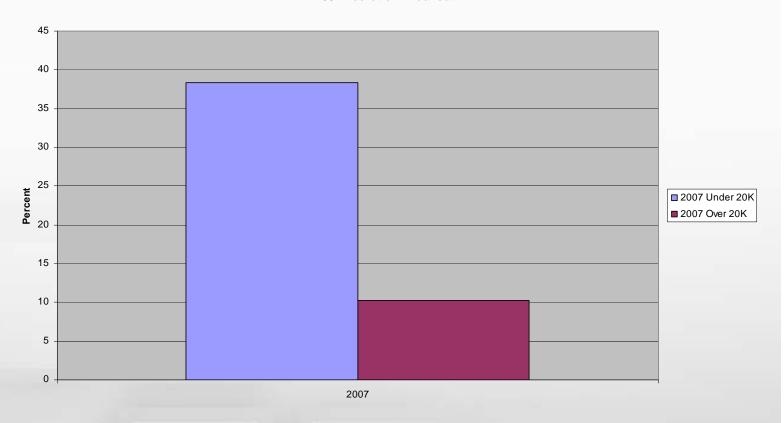
Clients with a smaller debt load – debt comprised of many accounts and have low balances - results in higher accretion







2007 Accretion Breakout





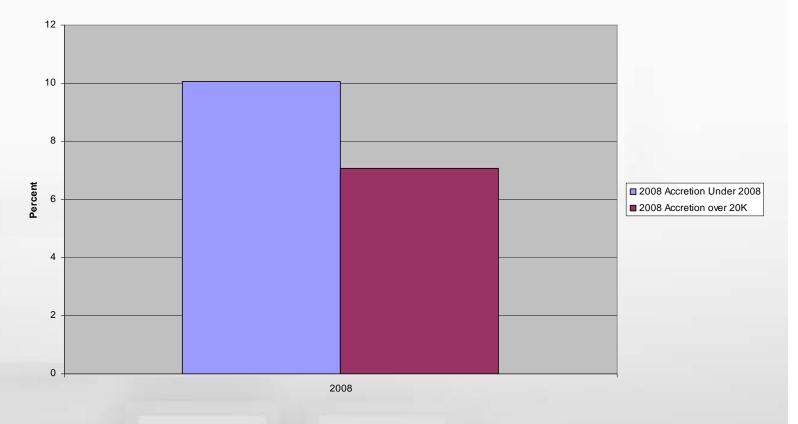






Reduction in accretion is reflected in increased average balance

2008 Accretion Breakout





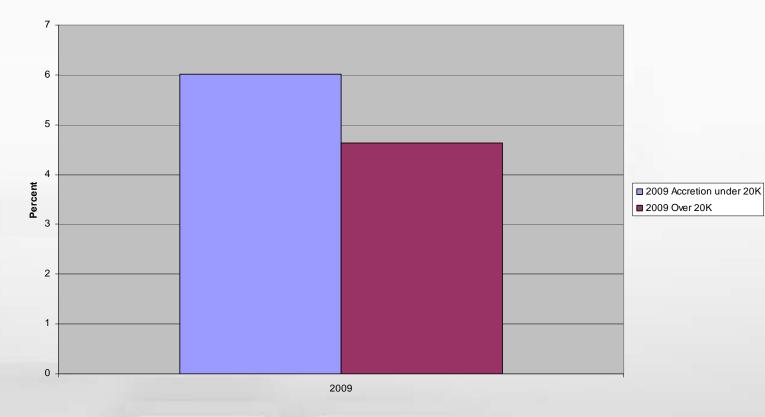






Time Frame of settlement decreases the accretion of a debt

2009 Accretion Breakout



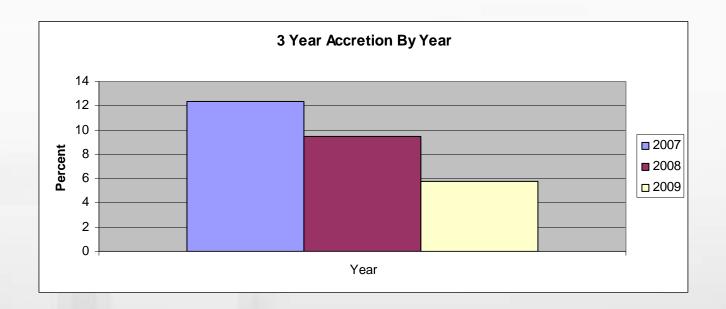


A fee model designed to address accretion, the total cost of the program, and increased litigation, means designing a program that remits settlements to the debt owner in the shortest time frame possible

















Overview of US Debt Resolve Graduates

Program Length	
Average	34 Months
Minimum	12 Months
Maximum	60 Months

Service Fees	
Average (%)	11.95%
Average Fee(\$)	\$3,615









Debt Loads	
Average Debt	\$29,739
Minimum Debt	\$3,500
Maximum Debt	\$325,000

Average Original Balance	51.8%
Average Current Balance	43.48%

Accretion		
Average	11.27%	